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July 2, 2014

Via Electronic Case Filing

Hon. Fredric Block, U.S.D.J.
United States District Court, E.D.N.Y.
225 Cadman Plaza East
Brooklyn, New York 11201.

Re: Espinoza et al v. Wanrong Trading Corp. et al
Civil Action No.: 13 Civ. 1727 (FB)(RML)

Dear Judge Block:

We represent the Plaintiffs and putative class in the above-referenced action. As stated in the docketed April 30, 2014 Report of Mediation, the parties recently settled this matter, in principal, on April 29, 2014. Since that time, the parties have been working together to finalize the terms of a class-wide settlement agreement. We are pleased to report that the parties have recently agreed on a comprehensive agreement, and are currently awaiting its execution.

We write this letter jointly with Defendants to respectfully request a one week extension to file a motion for preliminary approval of the class action settlement – from July 7, 2014 to July 14, 2014. This is the parties' first request to extend this deadline, and both parties consent to this extension.

On behalf of all parties, we thank Your Honor for your time and attention to this matter.

Respectfully yours,

A handwritten signature in black ink, appearing to read 'Brian S. Schaffer'. The signature is fluid and cursive, with a long horizontal stroke at the end.

Brian S. Schaffer